

REMARKS

This is intended as a full and complete response to the Office Action dated February 9, 2005, having a shortened statutory period for response set to expire on May 9, 2005. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-36 remain pending in the application and are shown above. Claims 26-29 have been canceled by Applicants. Claims 1-36 are rejected.

Claims 1, 17, 30 and 33 are amended to clarify the invention. These amendments are not presented to distinguish a reference, thus, the claims as amended are entitled to a full range of equivalents if not previously amended to distinguish a reference. Reconsideration of the rejected claims is requested for reasons presented below.

I. Rejection of claims 1-12 and 33-36 under 35 U.S.C. §102(e).

Claims 1-12 and 33-36 stand rejected under 35 USC §102(e) as being anticipated by *Srinivasan, et al.*, (U.S. 6,544,892; issued April 8, 2003). Applicants respectfully traverse this rejection. Applicants have amended claims 1 and 33. Applicants believe that the changes made herein do not introduce new matter.

Applicants believe that the amendments of claims 1 and 33 obviate the rejection of claims 1 and 33, and claims 2-12 and 34-36 which depend thereon respectively over *Srinivasan, et al.* *Srinivasan, et al.* teaches "polishing a surface of an article using a polishing pad, water, abrasive particles, and an organic compound having both a carboxylic acid functional group and a second functional group selected from amines and halides." (*Srinivasan, et al.*, column 4, lines 61-65). Thus, *Srinivasan, et al.* teaches a one-step process for polishing the surface of an article. As recited in Applicants claims 1 and 33, Applicants claim "pre-polishing the substrate to planarize the substrate by removing a bulk overfill of the first dielectric material." As a result, the one step polishing method of *Srinivasan, et al.* differs from the two-step polishing sequence claimed by Applicants.

As such, *Srinivasan, et al.* fails to teach, show or suggest the invention claimed by Applicants wherein the substrate is pre-polished to planarize the substrate by removing a bulk overfill of the first dielectric material. The Applicants therefore believe that claims 1 and 33 are patentable. Accordingly, the Applicants respectfully request the rejection of claim 1, claims 2-12 which depend thereon, claim 33, claims 34-36 which depend thereon, based on *Srinivasan, et al.* be withdrawn and the claims be allowed.

II. Rejection of claims 13-16 under 35 U.S.C. §103(a).

Dependent claims 13-16 stand rejected under 35 USC §103(a) as being unpatentable over *Srinivasan, et al.*, in view of *Zuniga, et al.* (U.S. 6,146,259; issued November 14, 2000). Applicants respectfully traverse this rejection. Applicants believe that the amendment of independent claim 1 makes claim 1 allowable and as a result, claims 13-16 which depend on claim 1 have also been placed in condition for allowance. Withdrawal of the rejection is respectfully requested.

III. Rejection of claims 17-25 under 35 U.S.C. §103(a).

Claims 17-25 stand rejected under 35 USC §103(a) as being unpatentable over *Srinivasan, et al.*, in view of *Zuniga, et al.* Applicants respectfully traverse this rejection. Applicants have amended claim 17. Applicants believe that the changes made herein do not introduce new matter.

Applicants believe that the amendment of claim 17 obviates the rejection of claim 17 and claims 18-25 which depend thereon respectively over *Srinivasan, et al.* in view of *Zuniga, et al.* *Srinivasan, et al.* teaches “polishing a surface of an article using a polishing pad, water, abrasive particles, and an organic compound having both a carboxylic acid functional group and a second functional group selected from amines and halides.” (*Srinivasan, et al.*, column 4, lines 61-65). Thus, *Srinivasan, et al.* teaches a one-step process for polishing the surface of an article. *Zuniga et al.* teaches a method of polishing a substrate including placing a first face of the substrate against a

substrate-receiving purpose of a flexible member of a carrier head, the flexible member connected to and extending beneath a support structure of the carrier head to define a chamber, and positioning a second face of the substrate against the polishing pad. (*Zuniga, et al.*, col. 2, lines 60-64). Applicants claim “pre-polishing the substrate to planarize the substrate by removing a bulk overfill of the first dielectric material” as recited in Applicants claim 17. As a result, *Srinivasan, et al.* in view of *Zuniga, et al.* does not teach the pre-polishing step as recited by Applicants in claim 17.

As such, the combination of *Srinivasan, et al.* and *Zuniga, et al.* fails to teach, show or suggest the invention claimed by Applicants wherein the substrate is pre-polished to planarize the substrate by removing a bulk overfill of the first dielectric material. The Applicants therefore believe that claim 17 is patentable. Accordingly, the Applicants respectfully request the rejection of claim 17 and claims 18-25 which depend thereon, be withdrawn and the claims be allowed.

IV. Rejection of claims 30-32 under 35 U.S.C. §103(a).

Applicants believe that the amendment of claim 30 obviates the rejection of claim 30, and claims 31-32 which depend thereon respectively over *Srinivasan, et al.* in view of *Zuniga, et al.* *Srinivasan, et al.* teaches “polishing a surface of an article using a polishing pad, water, abrasive particles, and an organic compound having both a carboxylic acid functional group and a second functional group selected from amines and halides. The abrasive particles can be dispersed in the aqueous medium or they can be bonded to the polishing pad.” (*Srinivasan, et al.*, column 4, lines 61-67). Thus, *Srinivasan, et al.* teaches a one-step process for polishing the surface of an article. *Zuniga et al.* teaches a method of polishing a substrate including placing a first face of the substrate against a substrate-receiving purpose of a flexible member of a carrier head, the flexible member connected to and extending beneath a support structure of the carrier head to define a chamber, and positioning a second face of the substrate against the polishing pad. (*Zuniga, et al.*, col. 2, lines 60-64). As recited in Applicants claim 30, Applicants claim “a controller configured to cause the system to contact the substrate, such that the first polishing platen is in contact with the substrate, to remove a bulk overfill of a first dielectric material, and then to deliver to the substrate a polishing

composition having at least one organic compound therein such that the polishing composition is in contact with the substrate and the fixed abrasive polishing pad, and to remove the first dielectric material at a higher removal rate than a second dielectric material, wherein the at least one organic compound enhances the removal rate of the first dielectric material using the fixed abrasive chemical mechanical polishing pad without affecting the removal rate of the second dielectric material.” As a result, neither *Srinivasan, et al.* nor *Zuniga, et al.* teaches a first platen for removing the topography and the bulk of the oxide overfill, prior to a selective removal on a second platen as recited by Applicants in claim 30.

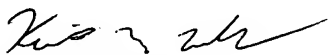
As such, the combination of *Srinivasan, et al.* and *Zuniga, et al.* fails to teach, show or suggest the invention claimed by Applicants wherein the first polishing platen is in contact with the substrate, to remove a bulk overfill of a first dielectric material; and a second polishing platen having a fixed abrasive polishing pad disposed thereon and in proximity with the substrate for polishing the substrate. The Applicants therefore believe that claim 30 is patentable. Accordingly, the Applicants respectfully request that the rejection of claim 30 and claims 31-32 which depend thereon, be withdrawn and the claims be allowed.

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed.

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, Applicants believe that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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